

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Linda Tirado,

Case No. 20-CV-01338 (JRT-JFD)

Plaintiff,

vs.

**DECLARATION OF GABRIEL  
SCHONFELD IN SUPPORT OF  
PLAINTIFF'S MOTION TO AMEND  
SCHEDULING ORDER**

City of Minneapolis; Minneapolis Chief  
of Police Medaria Arradondo, *in his  
official capacity*; Robert Kroll, *in his  
individual capacity*; and Minneapolis  
Police Department Officers John Does  
1-4, *in their official and individual  
capacities*,

Defendants.

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I, Gabriel Schonfeld, declare as follows:

1. I am an associate at the law firm of Sidley Austin LLP, counsel for Plaintiff Linda Tirado in this matter. I submit this declaration in support of Plaintiff's Motion to Amend Scheduling Order. I have personal knowledge of the matters set forth below, and could and would competently testify to them if called to do so.
2. Attached as **Exhibit A** is a true and accurate copy of certain email correspondence between counsel for the City of Minneapolis and Plaintiff's counsel, dated between August 5, 2021 and August 9, 2021.

3. Attached as **Exhibit B** is a true and accurate copy of an email sent by counsel for the City of Minneapolis to Plaintiff's counsel, dated August 19, 2021.
4. Attached as **Exhibit C** is a true and accurate copy of an email sent by counsel for the City of Minneapolis to Plaintiff's counsel, dated September 9, 2021.
5. Attached as **Exhibit D** is a true and accurate copy of an email sent by counsel for the City of Minneapolis to Plaintiff's counsel, dated September 24, 2021.
6. Attached as **Exhibit E** is a true and accurate copy of an email sent by counsel for the City of Minneapolis to Plaintiff's counsel, dated September 29, 2021.
7. Attached as **Exhibit F** is a true and accurate copy of certain email correspondence between counsel for the City of Minneapolis and Plaintiff's counsel, dated between October 1, 2021 and October 8, 2021.
8. Attached as **Exhibit G** is a true and accurate copy of Plaintiff's First Set of Requests for Production of Documents by Defendants City of Minneapolis and Chief of Police Medaria Arradondo, served on October 23, 2020.
9. Attached as **Exhibit H** is a true and accurate copy of Plaintiff's Second Set of Requests for Document Production to Defendants City of Minneapolis and Chief of Police Medaria Arradondo, served on August 19, 2021.
10. Attached as **Exhibit I** is a true and accurate copy of a letter from Plaintiff's counsel to counsel for the City of Minneapolis, dated November 15, 2021.

11. Attached as **Exhibit J** is a true and correct copy of transcript excerpts from the deposition of George Peltz, taken September 30, 2021.
12. Attached as **Exhibit K** is a true and correct copy of transcript excerpts from the deposition of Brian Bennett, taken October 21, 2021.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed at Washington, District of Columbia on November 24, 2021.

By: /s/ Gabriel Schonfeld  
Gabriel Schonfeld